

ORTIZ & ORTIZ, L.L.P.
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Frank A. Ortiz (1931-2016)
Norma E. Ortiz*

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Martha de Jesus*
* (Admitted in New York and New Jersey)

February 2, 2018

Hon. Nancy Hershey Lord
U.S. Bankruptcy Court
271-C Cadman Plaza East
Brooklyn, New York 11201

**Re: Boysin R. Lorick
Cynthia T. Lorick
Case No. 16-45645**

Fee Application of Marilyn Macron, P.C.

Dear Judge Lord:

Marilyn Macron, P.C. filed a fee application that is returnable before the Court on March 8, 2018. After conferring with the U.S. Trustee's Office, Ms. Macron discovered that the time records filed in support of the application do not clearly set forth the time incurred and billed for traveling. In addition, a few of the entries contained lumped entries. Finally, Ms. Macron discovered that all of the third party invoices and expenses she incurred were not included in the fee application.

Attached hereto as Exhibit A is a copy of the revised time records that address the lumped entries. Attached as Exhibit B is a revised list of expenses and copies of the invoices. Ms. Macron has agreed to reduce her fee request by \$975.00, without prejudice to submitting another request for the time not included in the present fee application.

The Office of the U.S. Trustee was kind enough to review the application, and informally resolve the questions and concerns they had for Ms. Macron. Based upon these changes, we believe they have no objection to the request for fees and expenses as revised herein.

Thank you for your consideration.

Very truly yours,

Norma E. Ortiz

cc: Karam Dahiya (By email)
Nazar Khodorovsky (By email)

EXHIBIT A

**Marilyn Macron, P.C**

211 Beach 134th Street, First Floor Belle Harbor, NY 11694

Phone: 917-716-2611 | Fax: 718-946-7455

INVOICE

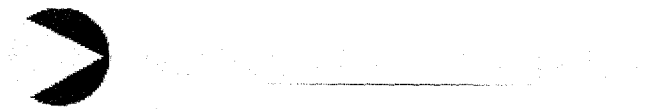
INVOICE# 1001**DUE ON:** 10/15/2017**BILL TO:**

Boysin Ralph Lorick and Cynthia Lorick

Date	Atty	DESCRIPTION	HOURS	RATE	AMOUNT
9/25/2017	MM	Review Case/File/Documents in prep for Aryeh deposition	1.00	\$300.00	\$ 300.00
9/26/2017	MM	Attend deposition of Aryeh at Certilman (3.5 hours), Review file in preparation for Ortiz Deposition(.5) Travel to Certilman (3 hours billed at half rate)	6.50	\$300.00	\$ 1,950.00
9/27/2017	MM	Attend Deposition of Norma Ortiz at Certilman (5.5), Conf w/ NO and Martha de Jesus re: witness testimony (.25), email corresp w/ counsel re: depositions/escrow/financing/assignment (.3), Travel time to Certilman billed at half rate (3 hours)	7.55	\$300.00	\$ 2,265.00
9/28/2017	MM	Review Lorick's declaration(.75), MDJ declaration(.75) and outline facts and argumets. Draft debtors' response to Ghalchi's motion to set aside sale (5.1 hour) , attend deposition of MDJ at Certilman (5 hours (Travel 3 hours, billed at half hourly rate)	12.60	\$300.00	\$ 3,780.00
9/29/2017	MM	Attend depositions of B. Lorick and C. Lorick at Certilman (6 hours), Travel time (3 hours, billed at half hourly rate)	7.50	\$300.00	\$ 2,250.00
10/1/2017	MM	Corres. w/ NO re: witness testimony and retention of SLB	0.10	\$300.00	\$ 30.00
10/2/2017	MM	Attend Deposition of Jack Guela at EDNY, conf. before Judge Craig(4 hours), Review Corresp. w/ NO and Veritex re: status, transcript receipt and review B/t counsel (.75)(Travel 2 hours, billed at half hourly rate)	5.75	\$300.00	\$ 1,725.00
10/3/2017	MM	Reviewedand Edited Debtors' Joint Pretrial Order, electronically filed same, emailed same to counsel. Conf/ with NO re: exhibits and terms of order (3). Receive/review/Glick letter to court; telephone call to SLB re: retention as Hearing Counsel and issues in case for trial (.7)	3.70	\$300.00	\$ 1,110.00
10/3/2017	SLB	Tel call w/ MM re: retention as hearing counsel and discussion of case	0.70	\$300.00	\$ 210.00
10/4/2017	MM	Trial Prep (reviewed file (1 hour)/deposition(2 hours)/drafted direct and cross exam of witnesses(1.5 hours)	4.50	\$300.00	\$ 1,350.00

Date	Atty	DESCRIPTION	HOURS	RATE	AMOUNT
10/4/2017	SLB	2 Tel calls w/ MM re: strategy for hearing(0.8), receive and review OTSC and outline arguments and counterarguments/Opp/Reply papers (2.4), Tel call w/ NO to discuss factual background of case(0.8), Read and review deposition transcript of Guela (0.8), Read and review Joint Pretrial Order (0.7)	5.50	\$300.00	\$ 1,650.00
10/5/2017	MM	Travel to/from EDNY from Queens N.Y. (2.0), trial before Judge Craig (7.0); conference with co-counsel (1.0)	9.00	\$300.00	\$ 2,700.00
10/5/2017	SLB	travel to/from EDNY from Queens N.Y. roundtrip (2.3 billed at half of time incurred), meet with client Lorik to prepare for his testimony (0.9), meet with Norma Ortiz and Martha DeJesus to prepare for their testimony, issues to be raised tomorrow and strategy for questioning witnesses and related trial prep (1hr), attend hearing before Judge Craig of the EDNY conducting cross-examination of two witnesses (7.0), telephone call with Norma Ortiz to discuss strategy and review hearing testimony (0.2), meeting with Marilyn MACron to discuss hearing testimony and strategy (1.0), review of hearing exhibits in preparation for cross-examination of witnesses (1.4)	12.20	\$300.00	\$ 3,660.00
10/6/2017	MM	travel to/from EDNY from Queens N.Y. (2. hours billed at half time incurred), trial before Judge Craig (7.0); conference with co-counsel after decision re future file handling (0.3)	8.30	\$300.00	\$ 2,490.00
10/6/2017	SLB	Travel to/from EDNY from Queens, N.Y. (2.2 billed at half time incurred), Discussions with client Lorik regarding his testimony (0.3), Conduct hearing before Judge Craig of the EDNY Bankruptcy Ct cross-examining four witnesses and presenting closing argument (6.2), Discussions with client Lorik following decision (0.2), Discussions regarding future actions on the case with Marilyn Macron and Norma Ortiz (0.3)	8.10	\$300.00	\$ 2,430.00
10/10/2017	MM	Receive/Review Appellant Designation of Contents for Inclusion in Record on Appeal and Statement of Issues and Notice of Appeal filed by R. McCord on behalf of Galchi	0.20	\$300.00	\$ 60.00
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -

EXHIBIT B



Marilyn Macron P.C
211 Beach 134th Street, First Floor Belle Harbor, NY 11694
Phone: 718-598-0512 | F 718-945-7455

EXPENSES

Date: 10/15/2017

BILL TO:

Boysin Ralph Lorick and Cynthia Lorick

[illegible]

Thank you for your business!

Veritext Corp
New York Region

330 Old Country Rd., Suite 300
 Mineola NY 11501
 Tel. (516) 608-2400 Fax. (516) 608-2450
 Fed. Tax ID: 20-3132569



Bill To: Marilyn Macron, Esq.
 Marilyn Macron PC
 211 Beach 134th Street
 Belle Harbor, NY, 11694

Invoice #: NY3106765
Invoice Date: 9/28/2017
Balance Due: \$1,623.28

Case: Lorick v.
Job #: 2716933 | Job Date: 9/27/2017 | Delivery: Daily
Billing Atty: Marilyn Macron, Esq.
Location: Certilman Balin Adler
 90 Merrick Avenue | 9th Floor | East Meadow, NY 11554
Sched Atty: Richard J. McCord, Esq. | Certilman Balin Adler & Hyman LLP

Witness	Description	Amount
Norma Ortiz	Transcript - Fee for Daily	\$619.50
	Transcript Services	\$665.50
	Exhibit Management	\$191.60
	Delivery and Handling	\$50.79
Notes:		Invoice Total: \$1,527.39 Payment: \$0.00 Credit: \$0.00 Interest: \$95.89 Balance Due: \$1,623.28

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Invoice #: NY3106765
Job #: 2716933
Invoice Date: 9/28/2017
Balance: \$1,623.28

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 Fed. Tax ID: 20-3132569



Bill To: Marilyn Macron, Esq.
 Marilyn Macron PC
 211 Beach 134th Street
 Belle Harbor, NY, 11694

Invoice #: NY3110094
Invoice Date: 10/2/2017
Balance Due: \$2,009.92

Case: Lorick v.
Job #: 2716939 | Job Date: 9/29/2017 | Delivery: Daily
Billing Atty: Marilyn Macron, Esq.
Location: Certilman Balin Adler
 90 Merrick Avenue | 9th Floor | East Meadow, NY 11554
Sched Atty: Richard J. McCord, Esq. | Certilman Balin Adler & Hyman LLP

Witness	Description	Amount
Boysin Ralph Lorick	Transcript - Fee for Daily	\$605.50
	Transcript Services	\$651.50
	Exhibit Management	\$159.75
	Delivery and Handling	\$48.69
Cynthia Theresa Lorick	Transcript - Fee for Daily	\$182.00
	Transcript Services	\$228.00
	Exhibit Management	\$15.75
Notes:		Invoice Total: \$1,891.19 Payment: \$0.00 Credit: \$0.00 Interest: \$118.73 Balance Due: \$2,009.92
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Chicago IL 60694-1303

Invoice #: NY3110094
Job #: 2716939
Invoice Date: 10/2/2017
Balance: \$2,009.92

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 Fed. Tax ID: 20-3132569



Bill To: Marilyn Macron, of Counsel
 Ortiz & Ortiz LLP
 32-72 Steinway St
 Ste 402
 Astoria, NY, 11103

Invoice #: NY3109388
Invoice Date: 10/2/2017
Balance Due: \$3,024.41

Case: Lorick v.
Job #: 2716937 | Job Date: 9/28/2017 | Delivery: Daily
Billing Atty: Marilyn Macron, of Counsel
Location: Certilman Balin Adler
 90 Merrick Avenue | 9th Floor | East Meadow, NY 11554
Sched Atty: Richard J. McCord, Esq. | Certilman Balin Adler & Hyman LLP

Witness	Description	Amount
Martha de Jesus	Transcript Services	\$1,288.50
	Transcript - Fee for Daily	\$1,242.50
	Exhibit Management	\$265.50
	Delivery and Handling	\$49.25
Notes: Erroneously omitted the charge for daily delivery. Replaces invoice # NY3108419		Invoice Total: \$2,845.75 Payment: \$0.00 Credit: \$0.00 Interest: \$178.66 Balance Due: \$3,024.41
TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information		

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Invoice #: NY3109388
Job #: 2716937
Invoice Date: 10/2/2017
Balance: \$3,024.41